

7852 Walker Drive, Suite 200 Greenbelt, Maryland 20770 phone: 301-459-7590, fax: 301-577-5575 internet: www.jsitel.com, e-mail: jsi@jsitel.com

AGGEPTED/MILED

June 23, 2015

JUN 2 3 1015

Via Hand Delivery

Federal Communications Commissions
Office of the Secretary

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

DOOKET FILE OOPY CRIGINAL

Re:

WC Docket No. 14-58

2015 ETC Annual Report of Golden West Telecommunications Cooperative, Inc.

- Armour

Study Area Code 391640

Dear Ms. Dortch:

On behalf of Golden West Telecommunications Cooperative, Inc. - Armour ("Company"), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules. Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information. The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the initial section 54.202(a) of its Progress Report on its Five-Year Service Quality Improvement Plan and of outage reporting as required by Section 54.313(a)(1).

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall JSI Vice President

301-459-7590

jkuykendall@jsitel.com

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

¹ 47 C.F.R. §§ 54.313, 54.422.

² Connect America Fund et al., WC Docket No. 10-90 et al., Protective Order, DA 15-712 rel. June 17, 2015 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).

Echelon Building II, Suite 200 9430 Research Blvd., Austin, TX 78759 phone: 512-338-0473, fax: 512-346-0822 Eagandale Corporate Center, Suite 310 1380 Corporate Center Curve, Eagan, MN 55121 phone: 651-452-2660, fax: 651-452-1909 6849 Peachtree Dunwoody Road Bldg. B-3, Suite 200, Atlanta, GA 30328 phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane Bountiful, UT 84010 phone: 801-294-4576, fax: 801-294-5124

No. of Copies rec'd



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June 23, 2015

ACCEPTED/FILED

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Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

Federal Communications Commission
Office of the Secretary

Re:

WC Docket No. 14-58

2015 ETC Annual Report of Golden West Telecommunications Cooperative, Inc.

- Armour

Study Area Code 391640 Request for Confidentiality

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client Golden West Telecommunications Cooperative, Inc. - Armour (the "Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules, withholding from public inspection certain information contained in attachments to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

- The information for which the Company is seeking confidential treatment are attachments to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").³
- Pursuant to Section 54.313(a)(1), Rate-of-Return Eligible Telecommunications
 Carriers ("ETCs") must file with the Commission a Progress Report on its Five Year Service Quality Improvement Plan ("Progress Report") and must also
 report outages, both of which are contained in attachments to the 2015 Report.
- 3. The information contained in attachments for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment. The Company also seeks withholding from public inspection data pertaining to the Company's outages provided at FCC Form 481 Line 200 attachment, Service

^{1 47} C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

^{3 47} C.F.R. §§ 54.313, 54.422.

^{4 47} C.F.R. §§ 54.313(a)(1).

Outage Reporting. Information of this nature is confidential commercial information routinely withheld from public inspection.

4. With respect to identifying the degree to which the Five-Year Plan concerns a service that is subject to competition, the Line 112 attachment contains information of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment includes competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its March 5, 2013 Order, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories." Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

With respect to identifying the degree to which the outage data contained in the Line 200 attachment concerns a service that is subject to competition, the information pertains to the network and operations of a telecommunications company that has competitors that could benefit if they were able to have access to this information.

5. With respect to identifying possible exposure to competitive harm, the information contained in the subject attachments is information that is not customarily released to the public. The Five-Year Plan information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.

⁵ See Connect America Fund et al., WC Docket 10-90 et al., Order, DA 13-332 (rel. Mar. 5, 2013) ("March 5, 2013 Order") at para 9 citing Section 54.202(a) (1) (ii).

- 6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachments, the Company is filing the Five-Year Plan and outage attachments under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.
- 7. Any previous versions of this information are not publicly available.
- 8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
- 9. The Commission has previously concluded that there is a presumptive likelihood of substantial competitive harm from disclosure of outage information.⁶ The Commission also determined the disclosure of outage reporting information to the public could present an unacceptable risk of more effective terrorist activity and could therefore result in potential harm to the public and the national defense.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment, and to the Company's outage data provided at FCC Form 481 Line 200 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,

John Kuykendall JSI Vice President 301-459-7590

jkuykendall@jsitel.com

⁶ See In the Matter of New Part 4 of the Commission's Rules Concerning Disruptions to Communications, ET Docket No. 04-35, Report and Order and Further Notice of Proposed Rulemaking, FCC 04-188, rel. Aug. 19, 2004, para. 45.

FCC Form 481 - Carrier Annual Reporting REDACTED FOR PUBLIC INSPECTION Data Collection Form 391640 <010> Study Area Code AGGEPTEB/FILED ARMOUR INDEPENDENT TELEPHONE CO. <015> Study Area Name 2016 <020> Program Year JUN 2 3 2015 <030> Contact Name: Person USAC should contact Jill Reinert

| | with questions about this data | | |
|------------------|--|---|--|
| <035> | Contact Telephone Number: 6052792161 ext. Number of the person identified in data line <030> | | Facilities of the Secretary |
| <039> | Contact Email Address: Email of the person identified in data line <030> jillreinert@golden | west.com | |
| ANNUA | L REPORTING FOR ALL CARRIERS | | COmpletion Completion Required Restated |
| <100> | Service Quality Improvement Reporting | (complete attached worksheet) | (check box when complete) |
| | Outage Reporting (voice) | (complete attached worksheet) | 7 7 |
| <210> | < check box if no outages to report | | 1 Billian |
| <300> | Unfulfilled Service Requests (voice) 0 | | |
| <310> | Detail on Attempts (voice) | (ottach descrip | ntive document) |
| <320> | Unfulfilled Service Requests (broadband) | | 1 111111 |
| <330> | Detail on Attempts (broadband) | (attach descr | iptive document) |
| <400> | Number of Complaints per 1,000 customers (voice) | | |
| <410> | Fixed 0.0 | | / / |
| <420> | Mobile 0.0 | | |
| <430> <440> | Number of Complaints per 1,000 customers (broadband) Fixed 0.0 | | |
| <450> | Mobile 0.0 | | |
| <500> | Service Quality Standards & Consumer Protection Rules Compliance | (check to indicate certification) | 1 1 |
| <510> | 391640sd510.pdf | (attached descriptive document) | / / |
| <600> | Functionality in Emergency Situations | (check to indicate certification) | |
| | 391640sd610.pdf | (attached descriptive document) | / / |
| <610> | | | |
| | Company Price Offerings (voice) | (complete attached worksheet) | The state of the s |
| | Company Price Offerings (broadband) | (complete attached worksheet) | |
| | Operating Companies and Affiliates Tribal Land Offerings (Y/N)? | (complete attached worksheet) if yes, complete attached worksheet) | 111111 |
| | | Yes | <u>√</u> |
| <1010 | | (attach descriptive document) | MHH |
| <1100 | Certify whether terrestrial backhaul options exist (Yes or No) | (if not, check to indicate certification) | |
| <1110> <1200> | Terms and Condition for Lifeline Customers | (complete attached worksheet) (complete attached worksheet) | 111111 |
| | Price Cap Carriers, Proceed to Price Cap Additional Documentation World | | District Control of the Control of t |
| | Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange | | |
| <2000> | | (check to indicate certification) | " Silling |
| <2005> | Rate of Return Carriers, Proceed to ROR Additional Documentation Wor | (complete attached worksheet) | 111111 |
| <3000> | The second section of the second seco | (check to indicate certification) | A 1111111. |
| <3005> | | (complete attached worksheet) | 1 11111 |

| | ervice Quality Improvement Reporting Election Form | | FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013 |
|-------|--|--------------------------------|--|
| <010> | Study Area Code | 391640 | |
| <015> | Study Area Name | ARMOUR INDEPENDENT TELEPHONE C | 0. |
| <020> | Program Year | 2016 | |
| <030> | Contact Name - Person USAC should contact regarding this data | Jill Reinert | |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 6052792161 ext. | |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | jillreinert@goldenwest.com | |
| <110> | Has your company received its ETC certification from the FCC? | (yes/no) O O | |
| <111> | If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC? | (yes / no) O O | |
| <112> | Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your c CETC which only receives frozen support, your progress report is only required to address voice telephony service. | ompany is a | |
| | Please select the appropriate responses below (Yes, No, Not Applicable) to confir that the attached document(s), on line 112, contains a progress report on its five service quality improvement plan pursuant to §54.202(a). The information shall b submitted at the wire center level or census block as appropriate. | -year | Name of Attached Document |
| 113> | Maps detailing progress towards meeting plan targets | Yes | |
| 114> | Report how much universal service (USF) support was received | Yes | |
| 115> | How much (USF) was used to improve service quality and how support was used to improve | ve service quality Yes | |
| 116> | How much (USF) was used to improve service coverage and how support was used to improve | | |
| 117> | How much (USF) was used to improve service capacity and how support was used to improve | 103 | |
| 118> | Provide an explanation of network improvement targets not met in the prior calendar year. | Yes | |

| (200) Service Outage Reporting (Voice) | FCC Form 481 |
|--|---|
| Data Collection Form | OMB Control No. 3060-0986/OMB Control No. 3060-0819 |
| | July 2013 |

| <010> | Study Area Code | 391640 |
|-------|---|----------------------------------|
| <015> | Study Area Name | ARMOUR INDEPENDENT TELEPHONE CO. |
| <020> | Program Year | 2016 |
| <030> | Contact Name - Person USAC should contact regarding this data | Jill Reinert |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 6052792161 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | |

| <a> | <b1></b1> | <b2></b2> | <b3></b3> | <b4></b4> | <c1></c1> | <c2></c2> | <d>></d> | <e></e> | <f></f> | <g>></g> | <h></h> |
|-----------------------------|----------------------|-----------------------------|--|---|--|---|---|--|---|--|---|
| NORS Reference Number | Outage Start Date | Outage Start Time | Outage End Date | Outage End Time | Number of Customers Affected | Total Number of Customers | 911 Facilities Affected (Yes / No) | Service Outage Description (Check all that apply) | Did This Outage Affect Multiple Study Areas (Yes / No) | Service Outage Resolution | Preventative Procedures |
| | | | | 21. | | | | | | | |
| | | | *** | | | | | | | | |
| | | | | | 9 | See attached | | | | | |
| | | | - 40 - 00 - 00 - 00 - 00 - 00 - 00 - 00 | | we | rksheet | | | | | |
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| | | | | | | | | | | | |
| | NORS Reference | NORS Reference Outage Start | NORS Reference Outage Start Outage Start | NORS Reference Outage Start Outage Start Outage End | NORS Reference Outage Start Outage Start Outage End Outage End | NORS Reference Number Outage Start Time Outage End Date Outage End Time Outage End Time Number of Customers Affected | NORS Reference Number Date Outage Start Time Outage End Date Outage End Time Outage End Time Outage End Time Outage End Time Outage End Total Number of Customers Customers | NORS Reference Number Outage Start Date Outage End Date Outage End Date Outage End Time Outage End Total Number of Customers P11 Facilities Affected (Yes / No) —— See attached | NORS Reference Number Outage Start Date Outage End Date Outage End Date Outage End Time Outage End Total Number of Customers Affected (Yes / No) Service Outage Description (Check all that apply) —— See attached | NORS Reference Number Outage Start Date Outage Start Time Outage End Date Outage End Date Outage End Time Outage End Total Number of Customers Total Number of Customers Outage Start (Yes / No) Did This Outage Affect Multiple Study Areas (Yes / No) See attached | NORS Reference Number Date Outage Start Date Time Outage End Customers Affected Customers Affected (Yes / No) Fee attached Outage Start Outage Affected (Yes / No) Did This Outage Affect Multiple Study Areas (Yes / No) Service Outage Resolution |

| | ce Offerings including Voice Rate Data lection Form | FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013 |
|----------------|--|---|
| <010> | Study Area Code | 391640 |
| <015> | Study Area Name | ARMOUR INDEPENDENT TELEPHONE CO. |
| <020> | Program Year | 2016 |
| <030> | Contact Name - Person USAC should contact regarding this data | Jill Reinert |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 6052792161 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | jillreinert@goldenwest.com |
| <701> <702> | Residential Local Service Charge Effective Date Single State-wide Residential Local Service Charge | |

<703>

| State | <a2> Exchange (ILEC)</a2> | SAC (CETC) | Rate Type | Residential Local Service Rate | <bs></bs> <bs></bs> State Subscriber Line Charge | State Universal Service Fee | Mandatory Extended Area Service Charge | Total per line Rates and Fee |
|-------|---------------------------|------------|-----------|--|--|---|--|------------------------------|
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| | * | | | - See a | tached worksheet | | And the second of the second o | |
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| SERGIFFURGUES | Sadband Price Offerings Section Form | PCC Form 481 OMB Control No. 3050-0986/OMB Control No. 3050-0819 July 2013 |
|---------------|---|--|
| <010> | Study Area Code | 391640 |
| <015> | Study Area Name | ARMOUR INDEPENDENT TELEPHONE CO. |
| <020> | Program Year | 2016 |
| <030> | Contact Name - Person USAC should contact regarding this data | Jill Reinert |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 6052792161 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | jillreinert@goldenwest.com |
| | | |

| | 1 | | | Broadband Service - | | | Usage Allowance |
|-----------------|------------------|----------------------------------|---------------------|--------------------------|--|-------------------------|--|
| Exchange (ILEC) | Residential Rate | State Regulated Fees | Total Rate and Fees | Download Speed (Mbps) | Broadband Service - Upload Speed (Mbps) | Usage Allowance (GB) | Action Taken When Limit Reached (select |
| | | | | | | | |
| | | | 0 | | | | |
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| | | WORKSHOOT - | | L. M. | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | Exchange (ILEC) | Exchange (ILEC) Residential Rate | | - See attached | - See attached | - See attached | - See attached |

| (800) Op | erating Companies | | FCC Form 481 |
|-----------|--------------------------|---|---|
| Data Coli | lection Form | | QMB Control No. 3060-0986/OMB Control No. 3060-0819 |
| | THE PROPERTY AND ADDRESS | | July 2013 |
| <010> | Study Area Code | | 391640 |
| <015> | Study Area Name | | ARMOUR INDEPENDENT TELEPHONE CO. |
| <020> | Program Year | | 2016 |
| <030> | Contact Name - Person | USAC should contact regarding this data | Jill Reinert |
| <035> | Contact Telephone Nur | mber - Number of person identified in data line <030> | 6052792161 ext. |
| <039> | Contact Email Address | - Email Address of person identified in data line <030> | jillreinert@goldenwest.com |
| <810> | Reporting Carrier | Golden West Telecommunications- Armour | |
| <811> | Holding Company | Not Applicable | |
| <812> | Operating Company | Golden West Telecommunications- Armour | |

| S COLUMN TO THE | 1823 | *** |
|--|------------------|--|
| Affiliates | SAC | Doing Business As Company or Brand Designation |
| | | |
| | | |
| See : | attached worksho | tet |
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| AND THE RESERVE AND THE RESERV | | |
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| | bal Lands Reporting lection Form | | | FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3 July 2013 | 3060-0819 |
|-------|---|---------|----------------------------------|--|-----------|
| <010> | Study Area Code | | 391640 | 7 | |
| <015> | Study Area Name | | ARMOUR INDEPENDENT TELEPHONE CO. | | |
| <020> | Program Year | | 2016 | | |
| <030> | Contact Name - Person USAC should contact regarding this data | | Jill Reinert | | |
| <035> | Contact Telephone Number - Number of person identified in data line < | 030> | 6052792161 ext. | | |
| <039> | Contact Email Address - Email Address of person identified in data line < | :030> | jillreinert@goldenwest.com | | |
| <910> | Tribal Land(s) on which ETC Serves | Yankton | Sioux Reservation | | |
| <920> | Tribal Government Engagement Obligation | 391640s | nd920.pdf Name of Attache | d Document | |
| | | | Name of Attache | a Document | |

to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

<921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.

<922> Feasibility and sustainability planning;

<923> Marketing services in a culturally sensitive manner:

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes

<923> Marketing services in a culturally sensitive manner;
<924> Compliance with Rights of way processes
<925> Compliance with Land Use permitting requirements
<926> Compliance with Facilities Siting rules
<927> Compliance with Environmental Review processes
<928> Compliance with Cultural Preservation review processes
<929> Compliance with Tribal Business and Licensing requirements.

| Select | |
|----------------|--|
| Yes or No or | |
| Not Applicable | |
| Yes | |
| 111111111 | |
| Yes | |

| THE STATE OF THE STATE OF | lo Terrestrial Backhaul Reporting flection Form | FCC Form 481 CIMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013 |
|---------------------------|--|---|
| <010> | Study Area Code | 391640 |
| <015> | Study Area Name | ARMOUR INDEPENDENT TELEPHONE CO. |
| <020> | Program Year | 2016 |
| <030> | Contact Name - Person USAC should contact regarding this data | Jill Reinert . |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 6052792161 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | jillreinert@goldenwest.com |
| <1120> | Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No). | |
| <1130> | Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 k upstream within the supported area pursuant to § 54.313(g). | bps |

| Lifeline | erms and Condition for Lifeline Customers ection Form | | FCC Form 481 OM/8 Control No. 3050-0986/OM/8 Control No. 3060-0819 July 2013 |
|-----------|--|-----------|--|
| <010> | Study Area Code | | 391640 |
| <015> | Study Area Name | | ARMOUR INDEPENDENT TELEPHONE CO. |
| <020> | Program Year | | 2016 |
| <030> | Contact Name - Person USAC should contact regarding this data | | Jill Reinert |
| <035> | Contact Telephone Number - Number of person identified in data lin | e <030> | 6052792161 ext. |
| <039> | Contact Email Address - Email Address of person identified in data lin | ne <030> | jillreinert@goldenwest.com |
| <1210> | Terms & Conditions of Voice Telephony Lifeline Plans | | 391640sd1210.pdf |
| <1220> | Link to Public Website | НТТР — | Name of Attached Document |
| or the we | neck these boxes below to confirm that the attached document(s), on line 12 bsite listed, on line 1220, contains the required information pursuant to (a)(2) annual reporting for ETCs receiving low-income support, carriers must report: | 3-9208 | |
| <1221> | Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | 1 | |
| <1222> | Details on the number of minutes provided as part of the plan, | 1 | |
| <1223> | Additional charges for toll calls, and rates for each such plan. | V | |

| Data Coff | ice Cap Carrier Additional Documentation ection Form Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers | FCC Form 481 OMB Control No. 3060-0986/DMB Control No. 3060-0819 July 2013 |
|--------------------------------------|---|---|
| | | |
| <010> | Study Area Code | 391640 |
| <015> | Study Area Name | ARMOUR INDEPENDENT TELEPHONE CO. |
| <020> | Program Year Contact Name - Person USAC should contact regarding this data | 2016 |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | Jii keinere |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | 6052792161 GAL. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> |]lilreinert@goldenwest.dom |
| | e appropriate responses below (Yes, No, Not Applicable) to note compliance as America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information of the complex of t | a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, a nation reported on this form and in the documents attached below is accurate. |
| <2010> | 2nd Year Certification (47 CFR § 54.313(b)(1)i) | |
| <2011a> | | |
| <2011b> | Attachment {47 CFR § 54.313(b)(1)ii} | |
| | | Name of Attached Document(s) Listing Required Information |
| <2012> <2013> <2014> <2015> | 2014 Frozen Support Calculation (47 CFR § 54.313(c)(2)) 2015 Frozen Support Calculation (47 CFR § 54.313(c)(3)) | |
| <2016> | Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d)) Certification Support Used to Build Broadband | |
| <2017> <2018> <2019> | 5th year Broadband Service Certification | |
| <2020> | Please check the box to confirm that the attached document(s), on lin pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support si addresses of community anchor institutions to which began providing preceding calendar year. | hall provide the number, names, and |
| <2021> | Interim Progress Community Anchor Institutions | |

| COURS Study Areas Code 3314.59 AMDION JURISH TERRAL PRIVATE CODE ADDRESS Study Areas CODE AD | (3000) R | ate Of Rétura Carrier Adultional Documentation | REDACTED FOR PUBLIC IN | GPECTION FCC form 444 |
|---|---|--|--|--|
| 1311.12 | | | | 会会为1660年,第555年的1664年,1664年,1665年,1655年,1655年,1655年,1656年,1656年,1656年,1656年,1656年,1656年,1656年,1656年,1656年,1656年 |
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| ORIONISE from Address: Cream Address of person between the data law colors ALL Colors and Colors a | <030> | Contact Name - Person USAC should contact regarding this data | | |
| OHCC the boxes below to note compliance on his five year sarvice quality plan (pursuant to 47 CPR § 14.202(e)) and, for privately held carriers, enturing compliance with the filancial reporting requirements set forth in 47 CPR § 14.313(f)(2). In bother certify that the information propried on this from and in the documents attached below is account. 331.64 out 3010.pdf | | | | |
| CFR \$4.318(R)(2). I further certify that the information reported on this form and in the documents strached below it accurate. 331.64.0 ad 301.0 : p.df | <039> | Contact Ernail Address - Email Address of person identified in data line <030> | jillreinert@goldenwest.com | |
| 33640 add 3010, pdf | CHECK | | | |
| Marco Cartification (47 CFR § 54.333(f)(1)(0) Marco Cartification (47 CFR § 54.331(f)(1)(0) Marco Cartification (57 CFR | | CFR § 54.313(f)(2). I further certify that t | | hed below is accurate. |
| Milestone Certification (47 CRR § 54.313(f)(1)(ii) Name of Attached Document Listing Required Information Please chack this host is confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313(f)(2) the carrier which provide the number, names, and edisposes of community anchor institutions (47 CRR § 54.313(f)(1)(ii)) [3012] Community Anchor Institutions (47 CRR § 54.313(f)(1)(iii)) Name of Attached Document Listing Required Information pursuant to § 54.313(f)(2)) Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2)) compliance requires: (2015) Electronic copy of their annual RUS reports (operating Report for Telecommunications Sorrows). [2016] Document(s) for Balanco Sheet, Income Statement and Statement of Cesh Flows [2017] If the response is yes on line 3014, stach your company's RUS annual report and all required documentation. [2018] If the response is yes on line 3014, stach your company's RUS annual report and all required documentation. [2019] Occument(s) for Balanco Sheet, Income Statement and Statement of Cesh Flows [2010] Occument(s) for Balanco Sheet, Income Statement and Statement of Cesh Flows [2010] Occument(s) for Balanco Sheet, Income Statement and Statement of Cesh Flows [2011] Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit of the response in no one lost, passes check the bores below to confirm your submission, on line 3028 pursuant to \$4.313(f)(2), contains of the second of the company of the audited financial statement of the second | | | 391640sd3010.pdf | |
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| Solid S.4.313 (ff.)(ff.) be carrier shall provide the number, names, and addresses of community anchor institutions (swhich began providing access to broadband service in the preceding calendar year. Solid | | | | ation |
| Name of Attached Document Listing Required Information (Yes/No) Security (Yes/No) | | § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addr | | 7 |
| Name of Attached Document Listing Required Information (Yes/No) Security (Yes/No) | | | 391640sd3012.pdf | |
| Name of Attached Document Listing Required Information (Yes/No) | | | | |
| Name of Attached Document Listing Required Information (Yes/No) | (3012) | Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii)) | 1 | |
| Is your company a Privately Held RDA Carrier (47 CFR § 54.333(f)(2)) (Yes,No) (Yes | ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, | | | |
| Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires: 13015 Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers) | | | Name of Attached Document Listing Required Information | |
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| Telecommunications Borrowers) (3016) Document(s) for Ballanoe Sheet, Income Statement and Statement of Cash Flows [3017] If the response is yes on line 3014, stach your company's RUS annual report and all required documentation Name of Attached Document Listing Required Information (7es/No) (1918) If the response is no on line 3014, is your company audited? (1918) If the response is yes on line 3015, please check the boxes below to confirm your submission, on line 3026 pursuant to \$4.318/(RU), contains Either a copy of their audited financial statement, or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications (3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows (3021) Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3018, please check the boxes below to confirm your submission, on line 3018, please check the boxes below to confirm your submission, on line 3018 pursuant to \$4.313/(1), contains: (3022) Copy of their financial statement which has been subject to review by an independent certified public accountant on parable to RUS Operating Report for Telecommunications (3023) Underlying information subjected to a review by an independent certified public accountant underlying information subjected to a review by an independent certified public accountant underlying information subjected to a review by an independent certified public accountant underlying information subjected to a review by an independent certified public accountant underlying information subjected to a noticer certification. (3023) Document(s) for Balance Sheet, income Statement and Statement of Cash Flows | | | 7, contains the required information pursuant to \$ 34.313(1) | 2) compilative requires. |
| 3016 Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows | (3015) | | | 47 |
| 391640 sd 3017, pdf | (3016) | 그리고 그 그 그 그 그리고 있는 그리고 있다면 그리고 | eh Flows | וכו |
| If the response is yes on line 3014, attach your company's RUS annual report and all required documentation | (0010) | boosingly for balance office, mount of automore and outermore of or | principal de la constant de la const | |
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| Name of Attached Document Listing Required information (Yes/No) | (301/) | 그 마른 전에 가장 사람들이 가장 하는 것이 되었다. 그 사람들이 되었다면 하는 것이 되었다면 하는 것이 없는데 하는데 하는데 하는데 하는데 하는데 하는데 하는데 하는데 하는데 하 | 1 | I |
| If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313f(Z), contains | | report and an required documentation | | |
| If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains (3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications (3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows (3021) Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains: (3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, (3023) Underlying information subjected to a review by an independent certified public accountant (3024) Underlying information subjected to an officer certification. Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows | | | Name of Attached Document Listing Required Information | |
| confirm your submission, on line 3025 pursuant to § 54.313(f)(2), contains Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit if the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains: (3022) Copy of their financial statement which has been subject to review by an independent certified public accountant, or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, (3023) Underlying information subjected to a review by an independent certified public accountant (3024) Underlying information subjected to an officer certification. Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows. | (3018) | If the response is no on line 3014, is your company audited? | (Yes/No) | |
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| If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains: (3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, (3023) Underlying information subjected to a review by an independent certified public accountant (3024) Underlying information subjected to an officer certification. (3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows | (3021) | Management letter and audit opinion issued by the independent certified p | ublic accountant that performed the company's financial audit | |
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| independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, Underlying information subjected to a review by an independent certified public accountant Underlying information subjected to an officer certification. Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows [3026] Attach the worksheet listing required information | (3022) | Copy of their financial statement which has been subject to review by an | | |
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| public accountant [3024] Underlying information subjected to an officer certification. [3025] Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows [3026] Attach the worksheet listing required information | | Borrowers, | | |
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| (3026) Attach the worksheet listing required information | | . : : : : : : : : : : : : : : : : : : : | ach Flaure | 41 |
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| (2009) rate of return Carrier restriction occumunication (continued) | PCC Form 481 |
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| Study Area Code | 391640 |
|---|--|
| Study Area Name | ARMOUR INDEPENDENT TELEPHONE CO. |
| Program Year | 2016 |
| Contact Name - Person USAC should contact regarding this data | Jill Reinert |
| Contact Telephone Number - Number of person identified in data line <030> | 6052792161 ext. |
| Contact Email Address - Email Address of person identified in data line <030> | 1illreinert@goldenwest.com |
| | Study Area Name Program Year Contact Name - Person USAC should contact regarding this data Contact Telephone Number - Number of person identified in data line <030> |

| Financial Data Summary | |
|---|----|
| (3027) Revenue | |
| (3028) Operating Expenses | |
| (3029) Net Income | |
| (3030) Telephone Plant In Service(TPIS) | V. |
| (3031) Total Assets | |
| (3032) Total Debt | |
| (3033) Total Equity | |
| (3034) Dividends | |

| CHECKLOSCIC COME | ion - Reporting Carrier ection Form | FCC Form 481: Offile Control No. 3080-0985/DMS Control No. 3080-0819 Auty 2013 |
|------------------|---|--|
| <010> | Study Area Code | 391640 |
| <015> | Study Area Name | ARMOUR INDEPENDENT TELEPHONE CO. |
| <020> | Program Year | 2016 |
| <030> | Contact Name - Person USAC should contact regarding this data | Jill Reinert |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 6052792161 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | jillreinert@goldenwest.com |

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate. Name of Reporting Carrier: ARMOUR INDEPENDENT TELEPHONE CO. Signature of Authorized Officer: CERTIFIED ONLINE Date 06/18/2015 Printed name of Authorized Officer: Dennis Law Title or position of Authorized Officer: CEO/General Manager Telephone number of Authorized Officer: 6052792161 ext. Study Area Code of Reporting Carrier: 391640 Filing Due Date for this form: 07/01/2015 Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

| F-45-7-123-1-156-1 | ion - Agent / Carrier action Form | FCC Form 483 ONIS Control No. 2060-0286/DMS Control No. 2060-0618 July 2013 |
|--------------------|---|---|
| <010> | Study Area Code | 391640 |
| <015> | Study Area Name | ARMOUR INDEPENDENT TELEPHONE CO. |
| <020> | Program Year | 2016 |
| <030> | Contact Name - Person USAC should contact regarding this data | Jill Reinert |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 6052792161 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | jillreinert@goldenwest.com |

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

| certify that (Name of Agent) | is authorized to submit the information reported on behalf of the report | ing carrier |
|--|---|-------------|
| also certify that I am an officer of the reporting carrier; ragent; and, to the best of my knowledge, the reports an | sponsibilities include ensuring the accuracy of the annual data reporting requirements provided to the a provided to the authorized agent is accurate. | authorized |
| Name of Authorized Agent: | | |
| Name of Reporting Carrier: | | |
| Signature of Authorized Officer: | Date: | |
| Printed name of Authorized Officer: | | |
| Title or position of Authorized Officer: | | |
| Telephone number of Authorized Officer: | | |
| Study Area Code of Reporting Carrier: | Filing Due Date for this form: | |

TO BE COMPLETED BY THE AUTHORIZED AGENT:

| Certification of Agent | Authorized to File Annual Reports for CAF or LI Rec | ipients on Behalf of Reporting Carrier |
|--|---|---|
| 리민 - '() 하는 | norized to submit the annual reports for universal service sup reporting carrier; and, to the best of my knowledge, the info | port recipients on behalf of the reporting carrier; I have provided rmation reported herein is accurate. |
| Name of Reporting Carrier: | | |
| Name of Authorized Agent or Employee of Agent: | | |
| Signature of Authorized Agent or Employee of Agent: | | Date: |
| Printed name of Authorized Agent or Employee of Agent: | | |
| Title or position of Authorized Agent or Employee of Agent | | |
| Telephone number of Authorized Agent or Employee of Ag | gent: | |
| Study Area Code of Reporting Carrier: | Filing Due Date for this form: | |

Attachments

| 00) Service ata Collect | e Outage Rep | oorting (Vo | olce) | | | | | | FCC Form 481 OMB Control N July 2013 | lo. 3060-0986/OMB Cont | rol No. 3060-0819 |
|-----------------------------|---------------------|-------------------------|--------------------|-----------------------|------------------------------------|---------------------------------|---|---|---|------------------------------|----------------------------|
| <010> Si | tudy Area Code | e | | | | | 391640 | | | | |
| <015> St | tudy Area Nam | ne | V | | | | ARMOUR IND | ENDENT TELEPHONE CO. | | | |
| <020> P | rogram Year | | | | | | 2016 | | | | |
| <030> C | ontact Name - | Person US | AC should cont | act regardi | ng this data | | Jill Reine | | | | |
| <035> C | ontact Telepho | one Numbe | r - Number of | person ide | ntified in data li | ne <030> | 6052792161 | xt. | | 16020 | |
| <039> C | ontact Email A | ddress - En | nail Address of | person ide | ntified in data l | ine <030> | jillreiner | goldenwest.com | | | |
| <220> | | | | | | | | | | | |
| <a>> | <b1></b1> | <b2></b2> | <b3></b3> | <b4></b4> | <c1></c1> | <c2></c2> | <d></d> | <e></e> | <f></f> | < | <h>></h> |
| NORS Reference Number | Outage Star Date | Outage Start Time | Outage End Date | Outage End Time | Number of Customers Affected | Total Number of Customers | 911 Facilities Affected (Yes / No) | Service Outage Description (Check all that apply) | Did This Outage Affect Multiple Study Areas (Yes / No) | Service Outage Resolution | Preventative Procedures |
| | | | | | - | | • | | - | | |
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| (700) Price Offerings including Voice Rate Data Data Collection Form | | FCC Form 481 OMS Control No. 3060-038 Rily 2013 | 6/GMB Control No. 3060-0819 |
|---|--------|---|-----------------------------|
| c010> Study Area Code | 391640 | £ € € € € € € € € € € € € € € € € € € € | |

| <010> | Study Area Code | 391640 |
|-------|---|----------------------------------|
| <015> | Study Area Name | ARMOUR INDEPENDENT TELEPHONE CO. |
| <020> | Program Year | 2016 |
| <030> | Contact Name - Person USAC should contact regarding this data | Jill Reinert |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 6052792161 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | jillreinert@goldenwest.com |

<701> Residential Local Service Charge Effective Date

<702> Single State-wide Residential Local Service Charge

<703>

| State | Exchange (ILEC) | SAC (CETC) | Rate Type | Residential Local Service Rate | State Subscriber Line Charge | State Universal Service Fee | Mandatory Extended Area Service Charge | Total per line Rates and Fed |
|-------|---------------------|------------|-----------|-----------------------------------|------------------------------|-----------------------------|--|------------------------------|
| D CI | Armour 605 724 | | FR | 16.0 | 0.0 | 0.0 | 0.0 | 16.0 |
| D | Bridgewater 605 729 | | PR | 16.0 | 0.0 | 0.0 | 0.0 | 16.0 |
| D | Bridgewater 605 729 | | FR | 17.5 | 0.0 | 0.0 | 0.0 | 17.5 |
| D | Canistota 605 296 | | PR | 16.0 | 0.0 | 0.0 | 0.0 | 16.0 |
| D | Canistota 605 296 | | FR | 17.5 | 0.0 | 0.0 | 0.0 | 17.5 |
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| Collection Form | Collection

jillreinert@goldenwest.com

<039> Contact Email Address - Email Address of person identified in data line <030>

| State | Exchange (ILEC) | Residential Rate | State Regulated Fees | Total Rates and Fees | | ⊀d3> Broadband Service -Upload Speed (Mbps) | Usage Allowance | Usage Allowance Action Taken When Limit Reached (select) |
|-------------|------------------------|---------------------|-------------------------|--|-----------|---|-----------------|--|
| SD | Armour 605 724 | 59.95 | 0.0 | 59.95 | 6.0 | 1.0 | 999999 | Other, May be discounted if cust subscribes to bundle |
| SD | Armour 605 724 | 79.95 | 0.0 | 79.95 | 15.0 | 1.0 | 999999 | Other, May be discounted if cust subscribes to bundle |
| SD | Armour 605 724 | 99.95 | 0.0 | 99.95 | 25.0 | 2.0 | 999999 | Other, May be discounted if cust subscribes to bundle Other, May be discounted if cus |
| SD | Armour 605 724 | 194.95 | 0.0 | 194.95 | 30.0 | 5.0 | 999999 | Other, May be discounted if cus subscribes to bundle |
| SD | Bridgewater 605 729 | 59.95 | 0.0 | 59.95 | 6.0 | 1.0 | 999999 | Other, May be discounted if cus subscribes to bundle |
| SD | Bridgewater 605 729 | 79.95 | 0.0 | 79.95 | 15.0 | 1.0 | 999999 | Other, May be discounted if cust subscribes to bundle Other, May be discounted if cust |
| SD | Bridgewater 605 729 | 99.95 | 0.0 | 99.95 | 25.0 | 2.0 | 999999 | Other, May be discounted if cust subscribes to bundle |
| SD | Bridgewater 605 729 | 194.95 | 0.0 | 194.95 | 30.0 | 5.0 | 999999 | Other, May be discounted if cust subscribes to bundle |
| SD | Canistota 605 296 | 59.95 | 0.0 | 59.95 | 6.0 | 1.0 | 999999 | Other, May be discounted if cus subscribes to bundle |
| SD | Canistota 605 | 79.95 | 0.0 | 79.95 | 15.0 | 1.0 | 999999 | Other, May be discounted if cust subscribes to bundle |
| SD | Canistota 605 296 | 99.95 | 0.0 | 99.95 | 25.0 | 2.0 | 999999 | Other, May be discounted if cust subscribes to bundle |
| SD | Canistota 605 296 | 194.95 | 0.0 | 194.95 | 30.0 | 5.0 | 999999 | Other, May be discounted if cust subscribes to bundle |
| ATTENNES TO | | | | | | | - | |
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| | erating Companies lection Form | | FCC Form 481 OMB Control No. 3060-0986/CMB Control No. 3060-0819 July 2013 |
|-------|--------------------------------|---|--|
| | | | |
| <010> | Study Area Code | | 391640 |
| <015> | Study Area Name | | ARMOUR INDEPENDENT TELEPHONE CO. |
| <020> | Program Year | | 2016 |
| <030> | Contact Name - Person | USAC should contact regarding this data | Jill Reinert |
| <035> | Contact Telephone Num | ber - Number of person identified in data line <030> | 6052792161 ext. |
| <039> | Contact Email Address - | Email Address of person identified in data line <030> | jillreinert@goldenwest.com |
| <810> | Reporting Carrier | Golden West Telecommunications- Armour | |
| <811> | Holding Company | Not Applicable | |
| <812> | Operating Company | Golden West Telecommunications- Armour | |

| Affiliates | SAC | Doing Business As Company or Brand Designation |
|--|--------|--|
| Livingston Telephone Company | 442107 | |
| Dalton Telephone Company | 371537 | |
| Elsie Communications, Inc. | 371518 | |
| Rye Telephone Company, Inc. | 462203 | 1, |
| S&A Telephone Co., Inc. | 411829 | |
| South Park Telephone Company | 462195 | |
| Waverly Hall Telephone, L.L.C. | 220392 | 20 miles (200 miles (2 |
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ATTACHMENT - LINE 112

Five-Year Network Improvement Plan and Progress Report

ATTACHMENT REDACTED IN ENTIRETY



Certification of Service Quality Standards & Consumer

Protection Rules Compliance for Voice and Broadband Services

Golden West Telecommunications Cooperative, Inc. (hereinafter "the Company") hereby certifies that it is complying with applicable service quality standards and consumer protection rules.

This document details the processes and procedures that the Company follows to ensure compliance with service quality standards and consumer protection rules as laid out in FCC Form 481 Instructions.

The Company provides voice grade access to the public switched telephone network (PSTN) at a flat rate, thereby enabling access to emergency services provided by local government or other public safety organizations such as 911.

For service quality standards that are affected by plant issues, the Company engineers and installs its plant and other facilities in such a way as to ensure, to the greatest extent possible, safe, adequate, and continuous service at all times.

In addition, employees are periodically trained on service quality standards and consumer protection issues. In particular, if any set of issues appear to be prevalent, employees are given briefings on how to handle such issues, beyond the normal guidelines in place for resolution of customer complaints. A recent example is the call completion problems that have arisen and the customer calls that are generated as a result. Although this is not a service quality problem caused by the Company, it does affect customers of the Company and, therefore, deserves the attention of the Company employees.

The Company also periodically reviews its operating procedures to be sure that those operating procedures are in compliance with service quality standards and that the operating procedures are not in violation of consumer protection rules. Internally a compliance officer ensures annual employee training and dictates disciplinary processes for improper use of consumer information. If concerns arise that cannot be handled by the compliance officer, legal counsel is sought to assist with a resolution.

If complaints are filed with the Company related to service quality standards or consumer protection rules, the complaint is immediately investigated, the matter tracked and any corrective action noted. This process ensures that problems are addressed and corrections made.

The Company advertises the availability of its services and the charges using media of general distribution and on its website.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C 47 C.F.R. Part 8 §8.3.